

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KHAN M. HASAN, on behalf of himself and
all others similarly situated,

Plaintiff,

V.

TWITTER, INC., JACK DORSEY, and NED
SEGAL,

Defendants

Case No. 4:19-cv-07149-YGR

CLASS ACTION

**[PROPOSED] ORDER GRANTING
MOTION FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF SELECTION OF
COUNSEL**

KHAFRE BARCLIFT, on behalf of himself
and all others similarly situated,

Plaintiff,

V.

TWITTER, INC., JACK DORSEY, and NED
SEGAL,

Defendants.

Case No. 5:19-cv-07992-BLF

1 Having considered the motion of Hakam Altohol (“Altohol”) for consolidation of the
2 above-captioned actions, appointment as Lead Plaintiff, and approval of selection of Counsel
3 (the “Motion”), and good cause appearing therefore, the Court ORDERS as follows:

4 1. The Motion is granted.

5 2. The above-captioned actions are consolidated for all purposes (the “Consolidated
6 Action”). This Order (the “Order”) shall apply to the Consolidated Action and to each case that
7 relates to the same subject matter that is subsequently filed in this Court or is transferred to this
8 Court, and is consolidated with the Action.

9 3. A Master File is established for this proceeding. The Master File shall be Civil
10 Action No. 4:19-cv-07149-YGR. The Clerk shall file all pleadings in the Master File and note
11 such filings on the Master Docket.

12 4. Every pleading in the Action shall have the following caption:

13 IN RE TWITTER, INC. SECURITIES
14 LITIGATION

Civil Action No. 4:19-cv-07149-YGR

15
16 5. Each new case that arises out of the subject matter of the Consolidated Action
17 shall be consolidated with the Consolidated Action. This Order shall apply thereto, unless a
18 party objects to consolidation (as provided for herein), or to any provision of this Order, within
19 ten (10) days after the date upon which a copy of this Order is served on counsel for such party
20 by filing an application for relief, and this Court deems it appropriate to grant such application.
21 Nothing in the foregoing shall be construed as a waiver of Defendants’ right to object to
22 consolidation of any subsequently-filed or transferred related action.

23 6. Altohol is appointed to serve as Lead Plaintiff in the Consolidated Action
24 pursuant to 15 U.S.C. § 78u-4(a)(3)(B).

25 7. Altohol’s selection of Labaton Sucharow LLP as Lead Counsel for the Class in
26 the Consolidated Action is approved pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v). Lead Counsel
27 shall have the authority to speak for all Plaintiffs and Class members in all matters regarding the
28 litigation, including, but not limited to, pretrial proceedings, motion practice, trial, and

1 settlement. Lead Counsel shall make all work assignments in such a manner as to facilitate the
 2 orderly and efficient prosecution of this litigation, and to avoid duplicative or unproductive
 3 effort. Additionally, Lead Counsel shall have the following responsibilities:

- 4 a. to brief and argue motions;
- 5 b. to initiate and conduct discovery, including, but not limited to, coordination of
 6 discovery with Defendants' counsel, and the preparation of written
 7 interrogatories, requests for admissions, and requests for production of
 8 documents;
- 9 c. to direct and coordinate the examination of witnesses in depositions;
- 10 d. to act as spokesperson at pretrial conferences;
- 11 e. to call and chair meetings of Plaintiffs' counsel as appropriate or necessary from
 12 time to time;
- 13 f. to initiate and conduct any settlement negotiations with Defendants' counsel;
- 14 g. to provide general coordination of the activities of Plaintiffs' counsel and to
 15 delegate work responsibilities to selected counsel as may be required, in such a
 16 manner as to lead to the orderly and efficient prosecution of this litigation and to
 17 avoid duplication or unproductive effort;
- 18 h. to consult with and employ experts;
- 19 i. to receive and review periodic time reports of all attorneys on behalf of Plaintiffs,
 20 to determine if the time is being spent appropriately and for the benefit of
 21 Plaintiffs, and to determine and distribute Plaintiffs' attorneys' fees; and
- 22 j. to perform such other duties as may be expressly authorized by further order of
 23 this Court.

24 **IT IS SO ORDERED.**

25 DATED: _____

HONORABLE YVONNE GONZALEZ ROGERS
 UNITED STATES DISTRICT JUDGE
 NORTHERN DISTRICT OF CALIFORNIA